A READER'S GUIDE TO THE SCHLIETER DOCUMENT COLLECTION

Schlieter v. County of Siskiyou et al. | *Case No. 24CV12876* | *Siskiyou County Superior Court*

Written by Samantha Schlieter | August 2026

I. A NOTE FROM ME

I want to be upfront about something before you read any further: I'm not a lawyer, and this isn't a legal brief. It's a collection of documents from two and a half years of my life — years I spent trying to do the right thing inside a broken system and paying for it in ways I'm still working through.

I was a mental health clinician at Siskiyou County Health and Human Services. I loved that work. I believed in it. And when I was pressured to falsify the state reports that funded it — to inflate client numbers and expenditure figures so the county could justify money it couldn't account for — I said no. What happened after that is documented in this collection.

I'm releasing this publicly because I want justice, and because I think the people of Siskiyou County and the state of California deserve to know how MHSA funds meant for the most vulnerable people in a rural community were managed. If that's something you care about, this is for you. If it's not, that's okay too — I'm not trying to convince anyone of anything. The documents speak for themselves.

I had help organizing and analyzing this material. Some of the analytical documents in this collection were prepared with the assistance of Claude (Anthropic's AI). I want to be transparent about that. The facts, the experiences, the evidence, and the conclusions are mine. The help I got was in structuring what I already knew and making it legible to people who weren't there.

I settled my civil lawsuit in July 2026. That settlement does not prevent me from talking about what happened, and it does not resolve the question of fraud against the state. Those complaints are now in the hands of the agencies that can do something about it. This collection is the public record of why I filed them.

> **ON PRIVACY:** I have reviewed this collection carefully to remove any documents containing client protected health information. If you believe something has been missed, please contact me directly. The welfare of the clients I served remains important to me.

II. WHAT HAPPENED

The short version is this.

Siskiyou County submits annual financial reports to the California Department of Health Care Services under the Mental Health Services Act. These reports — called ARERs — are signed under penalty of perjury and determine how much state and federal money the county receives for mental health programs. For years, those reports contained figures that didn't match reality.

I know because I was there. I was asked directly to help make the numbers work — to "backfill" client counts for a Full Service Partnership program that didn't have the clients it was claiming, and to support expenditure figures for prevention programs that couldn't be justified by actual contractor activity. When I

raised concerns, I was sidelined. When I refused, things got worse. By June 2024 the situation had become untenable and I left — which is what they call a constructive discharge.

My husband Brian worked there too. He was terminated in June 2025. His experience is part of this story as well.

In her civil deposition, HHS Director Sarah Collard admitted under oath that she certified financial reports she never reviewed. She admitted she may have used the phrase "backfill mental health" — and described that practice as illegal. She couldn't explain why three consecutive years of federal reimbursement figures were reported as zero. The county's own audited financial statements disclose more than $12 million in repayment liability to the state for behavioral health fund expenditures.

Separately, my supervisor Shannon Clymer — who holds an active LCSW license — used her sworn deposition to publicly identify my husband's private psychiatric diagnosis and use it to deny his gender identity on the record. She invoked her clinical credential to do it. Her signed errata sheet made no corrections to that testimony. That is the subject of a separate complaint to the California Board of Behavioral Sciences.

I am not here to destroy anyone. I am here because what happened was wrong, because it affected real clients who deserved better, and because the systems that exist to prevent this kind of thing need to actually work.

III. KEY PEOPLE

Those Who Caused Harm

- **Sarah Collard, Ph.D.** — HHS Director. Signed MHSA ARERs under penalty of perjury. Directed staff to falsify program data. Her deposition transcript is in this collection.
- **Shannon Clymer, LCSW #77167** — My direct supervisor. Named defendant in the civil case. Publicly disclosed my husband's private psychiatric diagnosis under oath and used it to deny his gender identity. Promoted to Deputy Director of HHS during litigation.
- **Rose Bullock** — Prepared the MHSA reports while simultaneously administering the contracts she was reporting on. A direct conflict of interest. Promoted to Deputy Director of Administration during litigation.
- **Rico Gutierrez, Daniel Bonham** — Named defendants in the civil action. See their deposition transcripts and Kimple interviews for their roles.

Those Who Corroborate

- **Tracie Lima** — Former Clinical Director. She was placed on administrative leave the same day my investigation was noticed. She retired in March 2025. Her Kimple interview is in this collection.
- **Krystl Harkins** — A colleague whose own Kimple interview corroborates the workplace conditions I experienced.
- **Eric Jauregui** — MHSA Coordinator who administered the 2023 PEI contractor RFP with documented irregularities.

- **Theo-Alice Pierce** — Prepared ARERs for FY 2021-22 and FY 2022-23. Relevant to the continuity of irregularities across fiscal years.

IV. WHERE TO START

If you're new to this material, I'd suggest reading in the order below. The fraud complaint gives you the framework. The Collard deposition gives you the admissions. Everything else fills in the picture.

If you're a journalist or investigator and you want to cut to the most important material: read the fraud complaint, then go straight to Collard's deposition. Those two documents together make the case.

	Start Here	Why
1	**MHSA Fraud Complaint and Whistleblower Report** 📁 *Documents Claude Created*	The master document. Sixteen fraud indicators, Collard's deposition admissions, the $12M+ repayment liability, and the complete analytical framework. Read this first — everything else is evidence for what this document alleges.
2	**Settlement Demand Brief** 📁 *ROOT — Settlement_Demand_Brief_v4.pdf*	Written before settlement, this document summarizes the full employment retaliation case — the timeline, the key witnesses, the legal theories, and the damages. Provides essential context for understanding why the MHSA fraud was connected to a pattern of workplace retaliation.
3	**Sarah Collard Deposition Transcript** 📁 *Depositions → Deposition of SARAH COLLARD*	The crown jewel. Director Collard's sworn testimony includes: certifying ARERs she never reviewed; admitting she may have used the phrase 'backfill mental health' and calling it illegal; failing to explain three consecutive years of zero FFP figures. Read alongside the fraud complaint.
4	**Kimple Investigative Interviews** 📁 *Kimple Interviews*	Pre-litigation sworn interviews conducted by the county's own CAO investigator in April 2024 with ten employees. Read Shannon Clymer's interview first — her admissions here differ materially from her later deposition testimony. The county's own investigator acknowledged that my supervisory chain was not a safe internal reporting avenue.
5	**MHSA Source Documents** 📁 *MHSA*	The actual ARERs, Three-Year Plans, and Annual Updates submitted by Siskiyou County to DHCS. These are the documents the fraud complaint analyzes. The anomalies described in FI-01 through FI-16 are visible in these filings.
6	**Shannon Clymer Deposition (PM Session)** 📁 *Depositions → Deposition of SHANNON CLYMER*	Pages 199-200 contain the core BBS violation — Clymer invoking her LCSW credential to publicly identify a private individual's DSM diagnosis and use it to deny his gender identity. Read in conjunction with the PM errata sheet (signed April 2, 2026), which left pages 199-200 entirely uncorrected.
7	**RFP Materials** 📁 *RFP*	The 2023 MHSA PEI contractor Request for Proposals and related procurement documents. Relevant to Fraud Indicator FI-11 — the degraded RFP process that compromised competitive bidding integrity.
8	**Filed Docs / Earlier**	The Third Amended Complaint is the operative court filing. The

	Start Here	Why
	Complaint Versions 📂 *Filed Docs / Earlier Complaint Versions*	earlier versions show how the case developed as additional evidence emerged over eighteen months of litigation.
9	**Samantha Production Sets** 📂 *Samantha Production Sets*	Documents produced by Samantha Schlieter in discovery. Shows what documentary evidence was available to both sides and how the case was built.

V. WHAT'S IN EACH FOLDER

📁 Documents Claude Created

These are the analytical documents I built to organize and present the evidence. I want to be clear about what they are: they're my analysis, informed by years of working inside this system and two and a half years of litigation. Some were prepared with AI assistance. They're not neutral — I have a point of view — but the underlying evidence they reference is documented and verifiable.

- **MHSA Fraud Complaint and Whistleblower Report** — The master document submitted to DHCS, the AG, and BHSOAC. Contains all 16 fraud indicators with cross-references to source documents.
- **Fraud Indicators Summary (App. 1)** — A consolidated table of FI-01 through FI-16 with supporting citations.
- **ARER/BHSOAC Cross-Analysis (App. 2)** — Year-over-year comparison showing stale data, internal contradictions, and mirrored language across fiscal years.
- **MHSA Contradiction Analysis (App. 3)** — Document-level conflicts across Three-Year Plans and Annual Updates, including a perjury certification with a literal 'XXXX' placeholder where the public hearing date should be.
- **PEI Contractor Master Analysis (App. 4)** — Conflict of interest documentation, RFP irregularities, and expenditure analysis for the Prevention and Early Intervention programs.
- **Siskiyou MHSA Metrics Analysis (App. 5)** — Quantitative analysis of FSP client counts and PEI expenditure trends against documented program capacity.

📁 Depositions

Certified transcripts from the civil litigation. These are sworn testimony. What people said in these rooms, they said under oath.

- **Sarah Collard** — Start here. Her admissions about the ARERs, the 'backfill' language, and the federal reimbursement figures are the core of the fraud case.
- **Shannon Clymer (AM + PM Sessions)** — The PM session pages 199-200 are what led to the BBS complaint. The AM session page 54 documents the pattern. Both errata sheets are included — notably, the PM errata left the most damaging pages entirely uncorrected.
- **Aimee Von Tungeln** — Deputy Clinical Director. Her testimony corroborates the workplace dynamics and MHSA program knowledge structure.

- **Christine Gannon, LCSW** — CSOC Supervisor. Contains useful admissions about program structure and oversight gaps.
- **Samantha Schlieter (Vols. 1 & 2)** — My own testimony.
- **Brian Schlieter** — My husband's testimony.

📁 Kimple Interviews

In April 2024, the county's own CAO investigator — Kevin Kimple — interviewed ten employees as part of an internal investigation. These are pre-litigation sworn accounts. I want to highlight something the county's own investigator acknowledged in these interviews: that my supervisory chain was not a safe avenue for internal reporting. That finding came from their investigation, not mine.

- **Interview with Shannon** — Read this alongside Clymer's deposition. The differences between what she told the county's investigator and what she later said under oath in litigation are significant.
- **Interview with Samantha** — My account to the county's own investigator, before any litigation.
- **Remaining interviews** — Krystl, Rico, Joey, Kariel, Katelynn, Amanda, Heather Werner, Kris Hargrove. Corroborating accounts from colleagues.

📁 MHSA

The actual documents submitted by Siskiyou County to the state. These are public records. The fraud indicators I've identified are visible in these filings — you don't have to take my word for it.

- ARERs for FY 2020-21, FY 2021-22, FY 2022-23, FY 2023-24
- Three-Year Plans for FY 2020-23 and FY 2023-26
- Annual Updates for FY 2022-23 and FY 2023-24
- MHSA Regulations — the legal standards the county was required to meet
- MHSA Plan of Correction 2023 — the state had prior compliance concerns. The county's written response is here too.
- Board of Supervisors meeting minutes relevant to MHSA oversight

📁 Filed Docs / Earlier Complaint Versions

The court filings from the civil litigation. The Third Amended Complaint is the most complete version — it reflects eighteen months of additional evidence gathering. The earlier versions show how the case developed.

📁 RFP

Procurement documents from the 2023 MHSA Prevention and Early Intervention contractor RFP. Relevant to the conflict of interest and expenditure questions.

📁 Samantha Production Sets

Documents I produced in discovery. Included here so you can see what both sides were working with.

VI. THE 16 FRAUD INDICATORS

The fraud complaint I submitted to state agencies documents sixteen specific indicators of fraud or material misrepresentation in Siskiyou County's MHSA filings. I've organized them into two tiers. Tier 1 reflects what I believe to be intentional misconduct, supported by direct admissions and documentary evidence. Tier 2 reflects anomalies that are documentable from the face of the submitted reports alone — things that don't require my testimony to see.

Tier 1 — Intentional Misconduct

- **FI-01** — Four consecutive years of identical PEI contractor outcome data submitted as current reporting
- **FI-02** — FSP client counts that cannot be reconciled with documented program capacity
- **FI-03** — Director-level pressure to falsify FSP counts and PEI expenditure figures — my direct experience
- **FI-04** — Director Collard certified ARERs under penalty of perjury without reviewing them — her own admission
- **FI-05** — Director Collard admitted she may have used the phrase 'backfill mental health' and called it illegal — her own words
- **FI-06** — Rose Bullock simultaneously prepared the ARERs and administered the PEI contracts she was reporting on
- **FI-13** — Internal data conflicts across Three-Year Plans and Annual Updates that cannot be explained by legitimate program changes
- **FI-14** — Outcome metrics tracked in earlier filings quietly dropped without explanation in later ones

Tier 2 — Material Anomalies Visible in the Documents

- **FI-07** — Federal Financial Participation reported as zero for three consecutive years — Director Collard had no explanation
- **FI-08** — PEI expenditure figures escalating inconsistently with documented program activity
- **FI-09** — A perjury certification signed and submitted with 'XXXX' where the required public hearing date should appear
- **FI-10** — A poverty rate figure that doesn't match publicly available Siskiyou County demographic data
- **FI-11** — Documented irregularities in the 2023 PEI contractor RFP process
- **FI-12** — More than $12 million in Behavioral Health repayment liability to the state disclosed in the county's own audited financials
- **FI-15** — Near-identical language across documents that purport to describe different fiscal years

- **FI-16** — Formatting and metadata anomalies inconsistent with independently prepared annual documents

VII. A FINAL WORD

I spent a long time wondering if this was worth it. The settlement I received after two and a half years of litigation — after depositions, after producing thousands of pages of documents, after watching my career in public mental health effectively end — came to less than four thousand dollars in my pocket. Ninety thousand dollars was the settlement. My attorneys received eighty-six thousand of it.

I'm not releasing that information to embarrass anyone. I'm releasing it because it's true, and because people who are considering blowing the whistle on public agency misconduct deserve to know what the road actually looks like. It is hard. The systems that are supposed to protect you are imperfect at best. You will not necessarily be vindicated in the way you imagine.

But the complaints are filed. The record exists. Sarah Collard's words are in a certified transcript that now sits in five state agency inboxes. Shannon Clymer's license is under review. The $12 million liability is documented. Whatever happens next is out of my hands, and I've made peace with that.

If you're reading this because you're in a similar situation — because you know something is wrong and you're trying to figure out what to do — I hope this collection is useful to you. Not as a roadmap to follow but as evidence that the documentation is possible, that the truth can be organized, and that you don't have to carry it alone.

That's what this is. The truth, organized. For those who want it.

— Samantha Schlieter, Yreka, California, August 2026

VIII. CONTACT

I'm available to answer questions, provide additional context, or speak with investigators and journalists.

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